

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 03-12499 MLW

TERRI L. PECHNER-JAMES)
and SONIA FERNANDEZ)
Plaintiffs)
)
VS.)
)
CITY OF REVERE, THOMAS)
AMBROSINO, MAYOR, CITY)
OF REVERE POLICE DEPT.)
TERRENCE REARDON, CHIEF)
OF POLICE, BERNARD FOSTER)
SALVATORE SANTORO, ROY)
COLANNINO, FREDERICK)
ROLAND, THOMAS DOHERTY)
JOHN NELSON, JAMES RUSSO)
MICHAEL MURPHY and)
STEVEN FORD)
Defendants)

CERTIFICATE OF COMPLAINE WITH LOCAL RULE 7.1(a)(2)

The undersigned hereby confirms that, prior to filing this request, he corresponded and conferred with Michael J. Akerson, Esq. Reardon, Joyce & Akerson, P.C. and Walter H. Porr, Esq. of the Office of the City Solicitor of the City of Revere.

In a letter dated March 27, 2006, Michael J. Akerson, Esq. acknowledged a discussion of this motion at Plaintiffs deposition, acknowledged the existence of the medical records and threatened court intervention. In a subsequent correspondence, this court promised to file this motion. On April 3, 2006, the plaintiffs prepared a JOINT Request For In Camera Inspection of Medical Records in an attempt to resolve the issue.

The Plaintiff faxed the proposed document to the office of both counsels for the Defendants. The next day, the office of Plaintiff's counsel, by telephone whether the proposed draft was acceptable. Both counsels for the Defendants categorically rejected the Joint Request.

The Plaintiff and her counsel have attempted, in good faith, to narrow the issues involved in this request as required by Local rule 7.1(a)(2).

Terri Pechner-James, Plaintiff
By her counsel

/s/ James S. Dilday, Esq.
James S. Dilday, Esq.
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